

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

MARK W. DOBRONSKI,

Case No. **2:24-cv-12512**

Plaintiff,

Honorable Brandy R. McMillion
United States District Judge

v.

1-800-LAW-FIRM, PLLC,

Honorable Kimberly G. Altman
United States Magistrate Judge

Defendant.

PLAINTIFF’S REPLY TO
DEFENDANT’S RESPONSE TO, AND NOTICE OF WITHDRAWAL OF,
PLAINTIFF’S MOTION TO AMEND SCHEDULING ORDER

NOW COMES Plaintiff, MARK W. DOBRONSKI, appearing *in propria persona*, and hereby replies to Defendant’s Response to Plaintiff’s Motion to Amend Scheduling Order (“Response”) [ECF 32], and further gives notice to the Court of Plaintiff’s withdrawal of Plaintiff’s Motion to Amend Scheduling Order (“Motion”) [ECF 31].

Subsequent to the filing of Plaintiff’s Motion, and three days *after* Defendant filed its Response, Defendant has responded to or supplemented the outstanding and very delinquent discovery requests: to wit: Plaintiff’s First Requests for Production of Documents [ECF 17, PageID.133-139]; Plaintiff’s Second Requests for Production of Documents [ECF 17, PageID.154-158]; and, Plaintiff’s Third Requests for

Production of Documents [ECF 17, PageID.164-170]. Although, Defendant's failure to object to the document production discovery requests within the thirty days provided by Fed. R. Civ. P. Rule 33 constituted a waiver of any objection, Defendant nonetheless interposed numerous objections. However, even with said objections, Plaintiff does not see a need for further delay to further compel responses from Defendant.

Likewise, Plaintiff had filed a motion to compel relative to a third-party subpoena issued to Google LLC. [ECF 31, PageID.393]. Plaintiff recently withdrew that motion. [ECF 33].

As to a 30(b)(6) deposition of Defendant [*see* ECF 32, PageID.396, ¶ 4], Plaintiff no longer sees a need for same.

Pursuant to the current Scheduling Order [ECF 12] in effect, discovery was due by May 27, 2025, and dispositive motion cutoff deadline was June 27, 2025. Given that Defendant has supplemented the heretofore outstanding and delinquent requests for interrogatories, albeit three days after the current discovery due date, Plaintiff has no further need for the discovery due date to be extended, nor does Plaintiff see a need for extending the dispositive motion cutoff date beyond the present deadline of June 27, 2025.

WHEREFORE, for the foregoing reasons, Plaintiff hereby withdraws his Motion to Amend Scheduling Order [ECF 31], and requests that the Court enter its order dismissing the Motion as moot and maintaining the deadlines as set forth in the

current Scheduling Order [ECF 12].

Respectfully submitted,



Date: June 4, 2025

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Plaintiff *In Propria Persona*

CERTIFICATE OF SERVICE

I hereby certify that on **June 4, 2025**, I electronically filed the foregoing *Plaintiff's Reply to Defendant's Response to, and Notice of Withdrawal of, Plaintiff's Motion to Amend Scheduling Order* with the Clerk of the Court via the Court's Pro Se Document Upload utility, which will send notification of such filing to all counsel of record via the CM/ECF system.



Mark W. Dobronski

